

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

AMANDA REIDT, on behalf of herself and
all others similarly situated,

CASE NO.: 3:23-cv-00234-slc

Plaintiff,

CLASS ACTION

v.

ADVANCED MARKETING AND
PROCESSING, INC., d/b/a PROTECT
MY CAR,

Defendant.

_____ /

MOTION TO WITHDRAW AS DEFENDANT’S COUNSEL

The undersigned counsel hereby file this Motion requesting that the Court permit attorneys Roy Taub and Douglas R. Sargent and the law firm of Greenspoon Marder LLP (collectively, “Counsel”), to withdraw as counsel for Defendant Advanced Marketing and Processing, Inc. d/b/a Protect My Car (“PMC”), and in support thereof state as follows:

1. Irreconcilable differences have arisen between Counsel and PMC, including with respect to the fulfillment of obligations to Counsel regarding its services, that have made it impossible for Counsel to continue to represent PMC.
2. Counsel is not aware of any successor attorney. As such, Counsel provides the mailing address and telephone number for PMC, which are: 570 Carillon Pkwy, #300, St. Petersburg, FL 33716, 1-800-253-2850.
3. Counsel submits that there will be no unnecessary delay or prejudice to any party as the case is in its initial stages, and proceedings have been stayed pending the Court’s ruling on PMC’s Motion to Compel Arbitration and to Dismiss Plaintiff’s Class Action Complaint (Dkt. No. 8).

4. Counsel requests that the Court permit PMC thirty (30) days to obtain counsel in this matter.

WHEREFORE, the undersigned counsel respectfully request the Court enter an order authorizing Roy Taub, Douglas R. Sargent, and the law firm of Greenspoon Marder LLP to withdraw as counsel of record for PMC, permitting PMC thirty (30) days to retain new counsel, and for such further relief as the Court deems appropriate.

Dated: November 10, 2023

GREENSPOON MARDER LLP

By: /s/ Roy Taub
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*Attorneys for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that, on November 10, 2023, this document is being electronically filed with the Court through CM/ECF, which will forward and serve a copy upon all counsel of record in compliance with the Federal Rules of Civil Procedure.

By: /s/ Roy Taub
ROY TAUB